

J. SCOTT MOEDE, OSB 934816  
Chief Deputy City Attorney  
[scott.moede@portlandoregon.gov](mailto:scott.moede@portlandoregon.gov)  
NAOMI SHEFFIELD, OSB 170601  
Deputy City Attorney  
[naomi.sheffield@portlandoregon.gov](mailto:naomi.sheffield@portlandoregon.gov)  
ROBERT YAMACHIKI, OSB 065560  
Senior Deputy City Attorney  
[rob.yamachika@portlandoregon.gov](mailto:rob.yamachika@portlandoregon.gov)  
Portland City Attorney's Office  
1221 SW 4th Ave., Rm. 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
Facsimile: (503) 823-3089  
*Of Attorneys for Defendant City of Portland*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORLAND DIVISION**

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated,

**PLAINTIFFS,**

v.

CITY OF PORTLAND, a municipal corporation, and MULTNOMAH COUNTY, a political subdivision of the State,

**DEFENDANTS.**

I, Naomi Sheffield, Deputy City Attorney, declare as follows:

1. The Amended Declaration of Matthew Cleinman was filed on August 13, 2020 ("Cleinman Declaration," Dkt. No. 150).

2. The Cleinman Declaration referenced “Cleinman Decl. Ex. 1” (Dkt. No. 150, ¶ 7) and included a placeholder for the referenced Exhibit 1 (Dkt. No. 150-1). Neither the Cleinman Declaration, nor the placeholder, appear to include a link to the referenced exhibit.

3. On August 15, 2020, I emailed plaintiffs’ counsel and requested a copy of the Cleinman Declaration Exhibit 1.

4. On August 21, 2020, plaintiffs’ counsel provided a link to the Cleinman Declaration Exhibit 1 video, as well as other videos referenced in the supporting declarations.

5. Pursuant to the Joint Status Report and Rule 26(f) Conference Report (Dkt. No. 152), the parties agreed that the City’s Response to the Amended Motion would be due fourteen (14) days from the date of the last filed declaration.

6. Because the City did not receive the last exhibit to plaintiffs’ supporting declarations until August 21, the City does not intend to file its Response until September 4, 2020, fourteen (14) days from receipt of the last video.

7. Plaintiffs’ counsel has confirmed that they do not object to the City notifying the Court of the City’s intent to file its Response on September 4, 2020.

8. I make this declaration in support of Defendant City of Portland’s Notice of Deadline for City’s Response to Plaintiffs’ Amended Motion for Finding of Contempt and for Sanctions Against Defendant City of Portland.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: August 27, 2020.

*/s/ Naomi Sheffield*  
Naomi Sheffield